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January 24, 2025

**VIA ECF**

Hon. Taryn A. Merkl, USMJ  
United States District Court for the Eastern District of New York

**Re: Crews v. Aldi, Inc. – 24-CV-4981(TAM)**  
**Joint Request for Extension of Time to Complete Discovery**

Dear Judge Merkl,

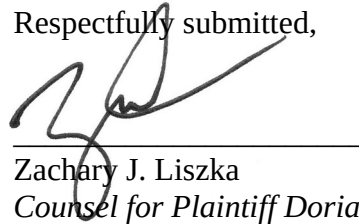
This law office represents Plaintiff Doriana Crews in the above-captioned matter before Your Honor. The parties jointly ask the Court to extend the time to complete fact discovery by two (2) months. Although the parties agreed to complete fact discovery by January 17, 2025, the parties have been unable to do so. At present, the parties are working together to resolve significant discovery disputes, including providing responses to the bulk of Plaintiff's written discovery requests and thereafter scheduling the depositions of Defendant's witnesses. This is the first request for an extension of this deadline.

The parties also note that they have worked together to reschedule mediation for February 4, 2025.

We thank you for your time and consideration of the parties' joint request.

Respectfully submitted,

By:

  
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Zachary J. Liszka  
*Counsel for Plaintiff Doriana Crews*